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Hawkeye Aluminum Div.
701 17th Street S.E.
Independence, IA

Pries Aluminum Div.
3136 Wagner Road
Waterloo, IA

Pries Enterprises, Inc.

Aluminum Extrusions with Fabrications
Including Painting
Box 777, 701 17th Street S.E.
Independence, Iowa 50644
Phone (319) 334-7068

March 15, 1988

Michael Sanderson
Chief, RCRA Branch
U.S. EPA
Kansas City, Kansas 66101

Dear Mr. Sanderson:

This letter is in answer to citations issued for noncompliance during an inspection by David N. Whiting at our facility in Independence, Iowa.

CITATIONS AND ACTIONS TAKEN

40 CFR 262.11 - HAZARDOUS WASTE DETERMINATION

Solid waste generated at this facility is not excluded under 40 CFR 261.4 and is listed as a hazardous waste in Subpart D of 40 CFR 261 - Hazardous Wastes from non-specific sources. The waste is identified as F019 - Wastewater treatment sludges from the chemical conversion coatings of aluminum.

40 CFR 262.34(a)(2) - DATE OF ACCUMULATION NOT CLEARLY MARKED ON CONTAINERS
Records for the generation of solid wastes were not properly maintained, approximate dates of generation will be determined by reviewing the waste stream pretreatment records.

40 CFR 262.34(b) - Accumulation of hazardous waste over 90 days.
Mis-management of the waste stream resulted in excessive solid waste generation. Administrative actions have been taken to insure that excessive wastes are not generated. Permits have been issued by Illinois EPA for disposal of solid waste (permit # 880069-0301390001), all solid wastes which are not in compliance will be removed from this facility as quickly as possible.

40 CFR 262.34(c)(i)(ii) - Satellite accumulation containers of spent solvent not labeled properly.

Containers of solvent used in the cleaning and rinsing of paint lines and equipment are now properly labeled and stored in the paint mixing room. Efforts are underway to locate a solvent reclaimer/redistiller to remove the spent solvents.

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RCRA Records Center

40 CFR 265 Subpart B - General Facility Standards
40 CFR 265 Subpart C - Preparedness and Prevention
40 CFR 265 Subpart D - Contingence plan and Emergency Procedures
40 CFR 265 Subpart G - Closure and Post-closure
40 CFR 265 Subpart H - Financial Requirements
40 CFR 265.73 - Operating Records

Due to excessive solid waste generation and accumulation 40 CFR 262.34(c) redefines a generator as an operator of a storage facility. Non-compliance with 40 CFR 262.34(c) will be corrected with-in 30 days, removing the requirement (Ref. 265.1) for compliance with 40 CFR 265 Subpart B, C, D, G, H and paragraph 73.

40 CFR 265.174 - Container Inspection
Container storage procedures have been changed to allow inspection.

Other actions:

Presently the processes which generated the waste stream and solid waste are being taken out of production for an indefinite period of time. This action is being taken to evaluate the feasibility of continued production. During this interim period no listed hazardous wastes will be produced at this facility.

Yours very truly,



Merle J. McMahon
President